

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANGELICA PARKER,

Plaintiff,

v.

SCOTT BURSOR AND BURSOR &
FISHER, P.A.,

Defendants.

Civil Action No. 1:24-cv-00245 (JGLC)
(RFT)

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support of Non-Party Movant Ivan Wilzig’s Motion to Quash the Subpoena dated June 24, 2024 (the “Subpoena”) served by defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, “Defendants”) and For a Protective Order, and the accompanying Declaration of Paul Schafhauser with exhibits thereto, non-party Ivan Wilzig, by and through his undersigned counsel, will move this Court before the Honorable Jessica G.L. Clarke, at the United States Courthouse, 500 Pearl Street, Courtroom 11B, New York, New York, on August 12, 2024, for the entry of an Order pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure (i) quashing the Subpoena to Produce Documents, Information, or Objects or To Permit Inspection of Premises in a Civil Action issued by Defendants to Mr. Wilzig, (ii) entering a Protective Order prohibiting Defendants from otherwise seeking any documents or information from Mr. Wilzig, and (iii) granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that non-party movant Ivan Wilzig requests oral argument on this motion if opposition is timely filed.

Dated: New York, New York
July 17, 2024

GREENBERG TRAURIG, LLP

By: /s/ Paul H. Schafhauser
Paul H. Schafhauser, Esq.
Clarissa Gomez, Esq.
One Vanderbilt Avenue
New York, New York 10017
Tel.: (212) 801-9200

*Attorneys for Non-Party Movant
Ivan Wilzig*